U.S. Department of the Interior Bureau of Land Management White River Field Office 73544 Hwy 64 Meeker, CO 81641

ENVIRONMENTAL ASSESSMENT

NUMBER: CO-110-2004-186-EA

CASEFILE/PROJECT NUMBER (optional): COC67999

PROJECT NAME: 2 Repeater Sites

LEGAL DESCRIPTION: Sixth Principal Meridian, Colorado

T. 1 N., R. 99 W.,

Sec. 19, SE¹/₄NW¹/₄. (site B)

T. 4 S., R. 97 W., Sec. 18, NW¹/₄SE¹/₄. (site A)

APPLICANT: EnCana Gathering Services (USA), Inc.

ISSUES AND CONCERNS (optional):

DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES:

Background/Introduction: EnCana Gathering Service (USA), Inc. has applied for 2 repeater sites on public land.

Proposed Action: The proposed action is for the installation of two 12 foot tall repeater sites. Access to both sites will be on existing roads and trails and will not require construction/upgrading for the access routes. EnCana Gathering Services plans on accessing these sites 4 times a year for maintenance.

Site A. is located in Whiskey Gulch. The repeater will be set in a cement filled rubber tire base. Site B is located in Fletcher Gulch and will temporarily have a repeater set in a cement filled rubber tire until such time that a cultural clearance can be completed. Presently, there is snow at the site and a cultural clearance is not possible at this time. Upon finishing the cultural survey, the repeater will be set in a 30 square foot concrete base. The reason for the more permanent base for Site B is because it is higher in elevation and exposed to higher wind conditions.

These sites will assist the producers with communications services for various wells in the Bull Fork area. The term of the right-of-way will be for 30 years and will be authorized under Section 28 of the Mineral Leasing Act of 1920, as amended.

No Action Alternative: The no action alternative would deny the application and a different means of in-field communication would have to be used.

ALTERNATIVES CONSIDERED BUT NOT CARRIED FORWARD:

NEED FOR THE ACTION: An application has been received for the installation of 2 repeater sites for in-field communications.

<u>PLAN CONFORMANCE REVIEW</u>: The Proposed Action is subject to and has been reviewed for conformance with the following plan (43 CFR 1610.5, BLM 1617.3):

Name of Plan: White River Record of Decision and Approved Resource Management Plan (ROD/RMP).

Date Approved: July 1, 1997

<u>Decision Number/Page</u>: Pages 2-49 thru 2-52

<u>Decision Language</u>: "To make public lands available for the siting of public and private facilities through the issuance of applicable land use authorizations, in a manner that provides for reasonable protection of other resource values."

<u>AFFECTED ENVIRONMENT / ENVIRONMENTAL CONSEQUENCES / MITIGATION MEASURES</u>:

STANDARDS FOR PUBLIC LAND HEALTH: In January 1997, Colorado Bureau of Land Management (BLM) approved the Standards for Public Land Health. These standards cover upland soils, riparian systems, plant and animal communities, threatened and endangered species, and water quality. Standards describe conditions needed to sustain public land health and relate to all uses of the public lands. Because a standard exists for these five categories, a finding must be made for each of them in an environmental analysis. These findings are located in specific elements listed below:

CRITICAL ELEMENTS

AIR QUALITY

Affected Environment: There are no special designation air sheds or non-attainment areas nearby that would be affected by the proposed action. During periods of low precipitation, air

quality in the area of the proposed action is often diminished by dust caused by human disturbance

Environmental Consequences of the Proposed Action: The proposed action would result in short term, local impacts to air quality during and after construction, due to dust being blown into the air. This impact is expected to occur four times a year.

Environmental Consequences of the No Action Alternative: No increase in dust will occur.

Mitigation: The operator shall be required to water the roads if fugitive dust becomes a problem.

CULTURAL RESOURCES

Affected Environment: The proposed location has been inventoried at the Class III (100% pedestrian) level to 50 feet either side of the road centerline (Newberry 1994, Compliance Dated 11/7/1994) with no cultural resources identified in the inventoried area.

Site B will have the repeater set in concrete and a rubber tire temporarily until such time that a cultural clearance can be completed. There is currently no inventory data for this proposed location.

Environmental Consequences of the Proposed Action: Provided the repeater equipment is sited within the 50 foot inventory area the proposed site A will not impact any known cultural resources.

For Site B, provided there is no ground disturbance and the ground is snow covered to at least six inches when the temporary facilities are installed there should be no impacts to any potential cultural resources that might be present.

Environmental Consequences of the No Action Alternative: There would be no new impacts to cultural resources under the No Action Alternative.

Mitigation: Site A: 1. The operator is responsible for informing all persons who are associated with the project operations that they will be subject to prosecution for knowingly disturbing historic or archaeological sites, or for collecting artifacts. If historic or archaeological materials are uncovered during any project or construction activities, the operator is to immediately stop activities in the immediate area of the find that might further disturb such materials, and immediately contact the authorized officer (AO). Within five working days the AO will inform the operator as to:

- whether the materials appear eligible for the National Register of Historic Places
- the mitigation measures the operator will likely have to undertake before the site can be used (assuming in situ preservation is not necessary)

• a timeframe for the AO to complete an expedited review under 36 CFR 800-11 to confirm, through the State Historic Preservation Officer, that the findings of the AO are correct and that mitigation is appropriate.

If the operator wishes, at any time, to relocate activities to avoid the expense of mitigation and/or the delays associated with this process, the AO will assume responsibility for whatever recordation and stabilization of the exposed materials may be required. Otherwise, the operator will be responsible for mitigation cost. The AO will provide technical and procedural guidelines for the conduct of mitigation. Upon verification from the AO that the required mitigation has been completed, the operator will then be allowed to resume construction.

2. Pursuant to 43 CFR 10.4(g) the holder of this authorization must notify the AO, by telephone, with written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4(c) and (d), you must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the authorized officer.

For the location of Site B the following mitigation will apply: 1. All construction and maintenance of the temporary facility must take place while the ground is frozen solid and/or covered by at least six inches of snow.

2. A Class III cultural inventory of the proposed location must be completed, and accepted by the BLM as adequate prior to the construction of the permanent facility. Additional stipulations may be added depending on the results of the cultural resources inventory.

INVASIVE, NON-NATIVE SPECIES

Affected Environment: There are no known noxious weeds at either site. The principal noxious weeds known to generally occur in the project area are houndstongue and mullein. The invasive alien cheatgrass will also readily colonize disturbed, nonrevegetated sites at the elevation and precipitation range of these project sites.

Environmental Consequences of the Proposed Action: The proposed action will create earthen disturbance which, if it is not properly revegetated, will provide safe sites for the establishment of noxious and invasive species.

Environmental Consequences of the No Action Alternative: There would be no change from the present situation.

Mitigation: Promptly recontour and revegetate all disturbed areas with Native Seed mix #7. The operator will be responsible for eradicating all noxious and invasive species which occur on site using materials and methods approved in advance by the Field Manager.

WASTES, HAZARDOUS OR SOLID

Affected Environment: There are no known hazardous or other solid wastes on the subject lands. No hazardous materials are known to have been used, stored or disposed of at sites included in the project area.

Environmental Consequences of the Proposed Action: No listed or extremely hazardous materials in excess of threshold quantities are proposed for use in this project. While commercial preparations of fuels and lubricants proposed for use may contain some hazardous constituents, they would be stored, used and transported in a manner consistent with applicable laws, and the generation of hazardous wastes would not be anticipated. Solid wastes would be properly disposed of.

Environmental Consequences of the No Action Alternative: No hazardous or other solid wastes would be generated under the no-action alternative.

Mitigation: The operator shall be required to collect and properly dispose of any solid wastes generated by the proposed actions.

CRITICAL ELEMENTS NOT PRESENT OR NOT AFFECTED:

No ACEC's, flood plains, riparian or wetland systems, prime and unique farmlands, Wild and Scenic Rivers or threatened, endangered or sensitive plant and animal species exist within the area affected by the proposed action. This action is not expected to have any impact upon migratory birds. Impacts to water quality are not anticipated; currently water quality meets the Land Health Standards and would continue to meet the standard as a result of the proposed action. The Public Land Health Standard for wetland or riparian systems is not applicable to this action, since neither the proposed or no-action alternative would have any influence on riparian habitats. There is no reasonable likelihood that the proposed action or no action alternative would have an influence on the condition or function of Threatened, Endangered, or Sensitive plant and animal species. Thus, there would be no effect on achieving the land health standard. There are also no Native American religious or environmental justice concerns associated with the proposed action.

NON-CRITICAL ELEMENTS

The following elements **must** be addressed due to the involvement of Standards for Public Land Health:

SOILS (includes a finding on Standard 1)

Affected Environment: The soils have been mapped in an order III soil survey by NRCS and are available from the office for review. Refer to the table below for the type of soils affected by the proposed action.

Proposed Action	Soil Number	Soil Name	Slope	Range site	Salinity	Run Off	Erosion Potential	Bedrock
Site A	43	Irigul-Parachute complex	12-45%5- 30%	Loamy Slopes/Mountain Loam	<2	Rapid	Slight to high	10-20
Site B	87	Starman- Vandamore complex	5-40%	Dry Exposure/Dry Exposure	<2	Medium	Moderate to very high	10-20

Environmental Consequences of the Proposed Action: Short-term impacts would be expected from any surface disturbing activity. Impacts from the proposed action would be compaction of the protective vegetation cover, from placement of the repeater stations. These impacts would be very short term.

Environmental Consequences of the No Action Alternative: In the no-action alternative, neither the surface disturbance nor the impacts to soils resources would occur.

Mitigation: None.

Finding on the Public Land Health Standard for upland soils: The proposed action will not affect the soils ability to meet the Land Health Standard.

VEGETATION (includes a finding on Standard 3)

Affected Environment: The Calamity Ridge site is located on a dry exposure range site. This site has a grassland aspect with scattered low shrubs such as dwarf rabbitbrush and scattered Wyoming big sagebrush. The Whiskey site is located on a loamy slopes range site characterized by mixed mountain big sagebrush and Utah serviceberry with a diverse understory of grasses and forbs.

Environmental Consequences of the Proposed Action: The proposed action would create minor earth disturbance which if revegetated will cause no significant negative impact.

Environmental Consequences of the No Action Alternative: There would be no change from the existing situation.

Mitigation: Apply mitigation in the invasive, non-native species section above.

Finding on the Public Land Health Standard for plant and animal communities (partial, see also Wildlife, Aquatic and Wildlife, Terrestrial): Upland plant communities in the project area(s) currently meet the Standard and will continue to meet the standards following implementation of the proposed action

WILDLIFE, AQUATIC (includes a finding on Standard 3)

Affected Environment: There is no aquatic wildlife within the project area.

Environmental Consequences of the Proposed Action: None.

Environmental Consequences of the No Action Alternative: None.

Mitigation: None.

Finding on the Public Land Health Standard for plant and animal communities (partial, see also Vegetation and Wildlife, Terrestrial): There is no aquatic wildlife within the project area. Therefore, this standard is not applicable.

WILDLIFE, TERRESTRIAL (includes a finding on Standard 3)

Affected Environment: Site A is located on the southern portion of Big Jimmy ridge in a mountain shrub community including serviceberry and sagebrush. This site falls within overall range for greater sage-grouse. Site B consists of a bald knob surrounded by serviceberry and sagebrush. It falls within Severe Winter Range for elk as designated in the White River Resource Management Plan and Record of Decision (RMP).

Environmental Consequences of the Proposed Action: Constructing these two sites is not expected to result in any adverse effects to terrestrial wildlife. The four trips per year to maintain the sites are insignificant. The disturbed area is minimal. No net loss of habitat for elk or sagegrouse will occur.

Environmental Consequences of the No Action Alternative: None.

Mitigation: Repeater Site B falls within designated Severe Winter Range for elk. As a condition of approval, the BLM may preclude development activities for up to 60 days from December 1 through April 30. Local weather conditions will dictate whether this condition is in effect or not. It is the responsibility of EnCana to contact the BLM to determine whether this condition is in effect prior to initiating surface disturbing activities.

Finding on the Public Land Health Standard for plant and animal communities (partial, see also Vegetation and Wildlife, Aquatic): This project would not jeopardize the viability of any animal population. It would have no significant consequence on terrestrial habitat condition, utility, or function, nor have any discernible affect on animal abundance or distribution at any landscape scale. This public land health standard will thus be met.

<u>OTHER NON-CRITICAL ELEMENTS</u>: For the following elements, only those brought forward for analysis will be addressed further.

Non-Critical Element	NA or Not Present	Applicable or Present, No Impact	Applicable & Present and Brought Forward for Analysis
Access and Transportation	Tresent	X	7 Milling St.S
Cadastral Survey	X		
Fire Management			X
Forest Management	X		
Geology and Minerals		X	
Hydrology/Water Rights	X		
Law Enforcement		X	
Paleontology			X
Rangeland Management		X	
Realty Authorizations		X	
Recreation		X	
Socio-Economics		X	
Visual Resources			X
Wild Horses	X		

FIRE MANAGEMENT

Affected Environment: Site B is proposed to be placed in a sagebrush meadow which is surrounded by mixed mountain shrubs and sub-mature pinyon trees to the east and south and an aspen stand to the north. The proposed action is located in the C5-Greasewood Creek fire management polygon where fire is desired but ecological constraints must be considered.

Site A is located in a sagebrush meadow surrounded by mixed mountain shrubs and sub-mature pinyon. The proposed location falls within the D5-Cathedral Bluffs/Roan Plateau fire management polygon where fire is desired and there are few constraints to its use.

Environmental Consequences of the Proposed Action: Construction of the two communication facilities will not significantly change the way fire is currently managed within the effected fire management polygons. The locations fall within fire dependant ecosystems and a fire event can be expected to occur at anytime within the months of June, July and August. Both locations have missed approximately one fire return interval and thus are overdue for a wildfire event which could be expected to be intense and difficult to control due to the above normal accumulation of fuel. The two locations surrounding vegetation communities are volatile fuels with the potential for rapid rates of spread and flame lengths in excess of 50 feet. The fuel loading and vegetation type present the potential for the proposed actions to be damaged or destroyed in the event of a wildland fire event in the absence of defensible space surrounding the locations.

Environmental Consequences of the No Action Alternative: There would not be the potential for damage or loss of property from wildland fire on public lands.

Mitigation: Upon completion of the proposed facilities, a defensible space of 3 times the height of the existing vegetation should be created and maintained in an ecologically viable manor to prevent damage or loss to the facilities from wildland fire.

PALEONTOLOGY

Affected Environment: Site A is in an area mapped as the Uinta Formation (Tweto 1979) which the BLM has classified as a Condition I formation which means it is known to produce scientifically important fossil resources.

Site B is in an area mapped as the Parachute Creek member of the Green River Formation (Tweto 1979) which the BLM has classified as a Condition I formation meaning it is known to produce scientifically important fossil resources. Site B will have a repeater in a rubber tire temporarily placed until such time that a cultural clearance can be completed. There is snow at the site now and a cultural clearance is not possible at this time.

Environmental Consequences of the Proposed Action: Site A; provided there is no excavation into bedrock there should not be any new impacts to fossil resources. Site B will have a repeater in a rubber tire temporarily placed until such time that a cultural clearance can be completed. Construction of the permanent facilities with excavation of footers for a concrete foundation and other disturbance that impacts the bedrock has the potential to adversely impact scientifically important fossil resources.

Environmental Consequences of the No Action Alternative: There would be no new impacts to fossil resources under the No Action Alternative.

Mitigation: Site A: as long as there is no excavation into the bedrock for facilities construction and maintenance: If paleontological materials (fossils) are uncovered during project activities, the operator is to immediately stop activities that might further disturb such materials, and contact the authorized officer (AO). The operator and the authorized officer will consult and determine the best option for avoiding or mitigating paleontological site damage.

Site B: For the temporary facilities installed while there is snow on the ground and the ground is frozen: If paleontological materials (fossils) are uncovered during project activities, the operator is to immediately stop activities that might further disturb such materials, and contact the authorized officer (AO). The operator and the authorized officer will consult and determine the best option for avoiding or mitigating paleontological site damage.

For the permanent facilities an inventory of the area by an approved paleontologist is required with a report detailing the results of the inventory with any recommended mitigation must be submitted to the BLM prior to the initiation of construction. If it becomes necessary to excavate into the bedrock for any reason during installation of the permanent facilities a paleontological monitor shall be required.

VISUAL RESOURCES

Affected Environment: The proposed action for site A is located within a VRM class III area. The objective of this class is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.

The proposed action for site B is located within a VRM class II area. The objective of this class is to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.

Environmental Consequences of the Proposed Action: The proposed action for both locations is to install 12 foot vertical repeater sites set on a concrete base. Existing access roads pass by the proposed sites. A casual observer would be able to view the site only when passing by at close range. Due to the narrow shape and low profile of the repeater sites, a casual observer traveling along routes that are commonly traveled in the area would not be able to view the sites. By painting the sites a darker color such as Juniper Green, less light would be reflected and the sites would blend better with existing vegetation in the area. The level of change to the characteristic landscape would be low and the standards of both the VRM II and III classifications would be retained.

Environmental Consequences of the No Action Alternative: There would be no additional environmental impacts from the no-action alternative.

Mitigation: Paint all facilities Juniper Green.

CUMULATIVE IMPACTS SUMMARY: This action is consistent with the scope of impacts addressed in the White River ROD/RMP. The cumulative impacts of oil and gas activities are addressed in the White River ROD/RMP for each resource value that would be affected by the proposed action.

PERSONS / AGENCIES CONSULTED:

REFERENCES CITED

Newberry, Gregory S.

Bull Fork Federal 18-1 Well Location and Flowline Cultural Resources Inventory Rio Blanco County, Colorado. Powers Elevation Co., Inc. Aurora Colorado.

Tweto, Ogden

1979 Geologic Map of Colorado. United States Geologic Survey, Department of the Interior, Reston, Virginia.

INTERDISCIPLINARY REVIEW:

Name	Title	Area of Responsibility		
Carol Hollowed	PE&C	Air Quality		
Tamara Meagley	NRS	Areas of Critical Environmental Concern		
Tamara Meagley	NRS	Threatened and Endangered Plant Species		
Michael Selle	Archeologist	Cultural Resources Paleontological Resources		
Mark Hafkenschiel	Rangeland Mgmt Spec.	Invasive, Non-Native Species		
Glenn Klingler	Wildlife Biologist	Migratory Birds		
Glenn Klingler	Wildlife Biologist	Threatened, Endangered and Sensitive Animal Species, Wildlife		
Bo Brown	Hazmat Collateral	Wastes, Hazardous or Solid		
Carol Hollowed	PE&C	Water Quality, Surface and Ground Hydrology and Water Rights		
Glenn Klingler	Wildlife Biologist	Wetlands and Riparian Zones		
Chris Ham	ORP	Wilderness		
Carol Hollowed	PE&C	Soils		
Mark Hafkenschiel	Rangeland Mgmt Spec.	Vegetation		
Glenn Klingler	Wildlife Biologist	Wildlife Terrestrial and Aquatic		
Chris Ham	ORP	Access and Transportation		
Ken Holsinger	NRS	Fire Management		
Robert Fowler	Forester	Forest Management		
Paul Daggett	Mining engineer	Geology and Minerals		
Mark Hafkenschiel	Rangeland Mgmt Spec.	Rangeland Management		
Penny Brown	Realty Specialist	Realty Authorizations		
Chris Ham	ORP	Recreation		
Keith Whitaker NRS		Visual Resources		
Valerie Dobrich	NRS	Wild Horses		

Finding of No Significant Impact/Decision Record (FONSI/DR)

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FINDING OF NO SIGNIFICANT IMPACT (FONSI)/RATIONALE: The environmental assessment and analyzing the environmental effects of the proposed action have been reviewed. The approved mitigation measures (listed below) result in a Finding of No Significant Impact on the human environment. Therefore, an environmental impact statement is not necessary to further analyze the environmental effects of the proposed action.

<u>DECISION/RATIONALE</u>: It is my decision to approve the proposed action with the mitigation measures listed below.

MITIGATION MEASURES:

- 1. The operator shall be required to water the roads if fugitive dust becomes a problem.
- 2. The operator is responsible for informing all persons who are associated with the project operations that they will be subject to prosecution for knowingly disturbing historic or archaeological sites, or for collecting artifacts. If historic or archaeological materials are uncovered during any project or construction activities, the operator is to immediately stop activities in the immediate area of the find that might further disturb such materials, and immediately contact the authorized officer (AO). Within five working days the AO will inform the operator as to:
 - whether the materials appear eligible for the National Register of Historic Places
 - the mitigation measures the operator will likely have to undertake before the site can be used (assuming in situ preservation is not necessary)
 - a timeframe for the AO to complete an expedited review under 36 CFR 800-11 to confirm, through the State Historic Preservation Officer, that the findings of the AO are correct and that mitigation is appropriate.

If the operator wishes, at any time, to relocate activities to avoid the expense of mitigation and/or the delays associated with this process, the AO will assume responsibility for whatever recordation and stabilization of the exposed materials may be required. Otherwise, the operator will be responsible for mitigation cost. The AO will provide technical and procedural guidelines for the conduct of mitigation. Upon verification from the AO that the required mitigation has been completed, the operator will then be allowed to resume construction.

3. Pursuant to 43 CFR 10.4(g) the holder of this authorization must notify the AO, by telephone,

with written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4(c) and (d), you must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the authorized officer.

- 4. For Site B the following mitigation will be required; (1.) All construction and maintenance of the temporary facility must take place while the ground is frozen solid and/or covered by at least six inches of snow. (2.) A Class III cultural inventory of the proposed location must be completed, and accepted by the BLM as adequate prior to the construction of the permanent facility. Additional stipulations may be added depending on the results of the cultural resources inventory.
- 5. Promptly recontour and revegetate all disturbed areas with Native Seed mix #7. The operator will be responsible for eradicating all noxious and invasive species which occur on site using materials and methods approved in advance by the Field Manager.
- 6. The operator shall be required to collect and properly dispose of any solid wastes generated by the proposed action.
- 7. Repeater Site B falls within designated Severe Winter Range for elk. As a condition of approval, the BLM may preclude development activities for up to 60 days from December 1 through April 30. Local weather conditions will dictate whether this condition is in effect or not. It is the responsibility of EnCana to contact the BLM to determine whether this condition is in effect prior to initiating surface disturbing activities.
- 8. Upon completion of the proposed facilities, a defensible space of 3 times the height of the existing vegetation should be created and maintained in an ecologically viable manor to prevent damage or loss to the facilities from wildland fire.
- 9. Site A: as long as there is no excavation into the bedrock for facilities construction and maintenance: If paleontological materials (fossils) are uncovered during project activities, the operator is to immediately stop activities that might further disturb such materials, and contact the authorized officer (AO). The operator and the authorized officer will consult and determine the best option for avoiding or mitigating paleontological site damage.
- 10. Site B: For the temporary facilities installed while there is snow on the ground and the ground is frozen: If paleontological materials (fossils) are uncovered during project activities, the operator is to immediately stop activities that might further disturb such materials, and contact the authorized officer (AO). The operator and the authorized officer will consult and determine the best option for avoiding or mitigating paleontological site damage.
- 11. For the permanent facilities an inventory of the area by an approved paleontologist is required with a report detailing the results of the inventory with any recommended mitigation must be submitted to the BLM prior to the initiation of construction. If it becomes necessary to excavate into the bedrock for any reason during installation of the permanent facilities a paleontological monitor shall be required.

12. All facilities are to be painted Juniper Green.

<u>COMPLIANCE/MONITORING</u>: Compliance will be conducted by the realty staff every five years.

NAME OF PREPARER: Penny Brown

NAME OF ENVIRONMENTAL COORDINATOR: Caroline Hollowed

SIGNATURE OF AUTHORIZED OFFICIAL:

Field Manager

DATE SIGNED:

11/19/04

ATTACHMENTS: Location map of the proposed action.

Exhibit A location of Site B Exhibit B location of Site A

Location of Proposed Action CO-110-2004-186-EA

